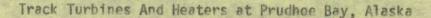
Region 10, Seattle, Washington



Raymond Nye Environmental Protection Specialist

Source File

We are now at that point in time where ARCO/SOHIO may be close to $\rm NO_X$ NAAQS which has prompted us to reevaluate PSD permitted sources on the North Slope.

Background

Because the extent of exploration in Prudhoe Bay is not fully known, ARCO/SOHIO does not know what the extent of final development will be. Add to this the remoteness of the field and adverse weather conditions the developers order equipment long before it arrives which may not meet the exact on site configurational needs. Based on a long permit review process and several years required to identify and install a piece of process equipment. The logistics of the situation require the Companies to "swap" turbines and heaters.

The companies would like us to process applications on the basis of total horsepower at the various locations. As indicated in the PSD IV application, the Company submitted and identified approximate horsepower needs at each location. Conservative emission parameters in the modeling for various horsepower additions were also used. Based on this scenario, we did not have problems issuing this permit based on this scenario. Furthermore, once exact design is known, the permit could be revised accordingly and impacts could be updated through additional impact analysis. Since establishing this policy, ARCO/SOHIO have submitted three emission swaps which define final engineering design and orders.

On April 5, 1983, both Companies were sent letters requesting an update of compliance with PSD permits since permits prior to PSD IV were issued for specific heater and turbine sizes. We requested that the companies update us as to the status of all permitted units. On June 2, 1983 Sohio responded to this request and also submitted another clarification for turbines that were installed at GC-2 for the PSD-II permit. The only set of turbines that need clarification and documentation occurred at the Sohio central power station. Originally, the station was permitted two 50 MW turbines however, in the Increment II application these turbine sizes were deleted and replaced with four 25 MW turbines. Power needs at that facility were reduced which prompted Sohio to delete three more 25 MW turbines; the end result begin one 25 MW turbine left.

Final: Nye: kaf:7/12/83:#4582X,p1

